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Oregon

DEPARTMENT OF  
AGRICULTURE

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Federal Communications Commission  
1919 M Street Suite 222  
Washington DC 20554

ATTN: Comments on Docket 92-235

Contact: Kevin Slater, Operations Manager (503) 378-3812

The following points outline the Oregon Department of Agriculture's major concerns with the proposed Docket 92-235, FCC Spectrum Refarming Proposal.

1. We would like to see the implementation date extended to the year 2004 or later. This would provide more time to plan the implementation of the new requirements and to budget to replace equipment that cannot be modified to fall into compliance with the new requirements. Cost of compliance will be a major factor.
2. The power restriction will be very detrimental for our agency. Based on the evaluations of the repeater sites used by both systems, we would be limited to an effective radiated power output of 5 watts, down from the typical 50 to 100 watts currently in use. This would result in loss of coverage area of roughly 50 percent. In order to maintain the current coverage, we would likely need to double the number of repeater sites. Since there is no guarantee of co-locating new repeater sites with other existing radio facilities, our cost to install a new repeater and antenna would range from \$18,000 to \$20,000 per site. If a building is required where none now exists, that cost would be in addition and would likely be prohibitive for the agency.
3. The power reduction and reduced deviation to comply with the new channelization plan would create even greater problems in metropolitan areas where a high density of buildings provide disruption in signal paths. By reducing the deviation in the transmitters to maintain a 4 KHz bandwidth, there would be a problem of contending with a noise floor which would play havoc with the radio signal. The signals would barely be audible above the background noise. In metropolitan areas, we'd likely see a reduction of 60 to 65 percent from the existing coverage area.

Barbara Roberts  
Governor



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In order to operate with the reduced bandwidth and power, we will have to replace or modify existing radio units, estimated at \$100 to \$200 per unit.

The older equipment likely cannot be modified and will require replacement. Each repeater requiring replacement would likely cost about \$7500, yet the actual cost is unknown since compatible units aren't even being manufactured yet.

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Another anticipated problem is the problem of power output being dropped